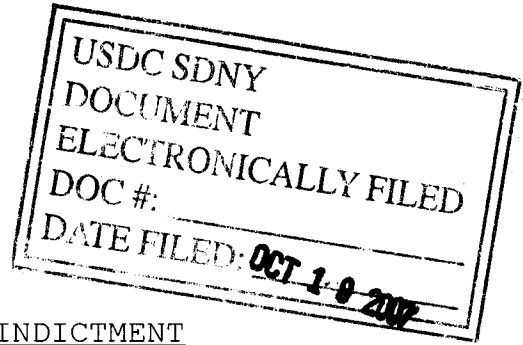


Judge Pauley

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

JORGE RAMIREZ, and
JOSE ESPINOSA,

Defendants.

INDICTMENT

07 Cr. ____

07 CRIM 976
COUNT ONE

The Grand Jury charges:

1. On or about September 20, 2007, in the Southern District of New York and elsewhere, JORGE RAMIREZ and JOSE ESPINOSA, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JORGE RAMIREZ and JOSE ESPINOSA, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 1 kilogram and more of mixtures and substances containing a detectable amount of heroin in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

3. It was further a part and an object of the conspiracy that JORGE RAMIREZ, the defendant, and others known

and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 1 kilogram of mixtures and substances containing a detectable amount of cocaine in violation of Sections 812, 841(a)(1), and 841(b)(1)(B) of Title 21, United States Code.

OVERT ACTS

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about September 20, 2007, JOSE ESPINOSA, the defendant, had in the car that he was driving a package containing approximately one kilogram of heroin.

b. On or about September 20, 2007, JORGE RAMIREZ, the defendant, had in his apartment a package containing approximately one kilogram of cocaine.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JORGE RAMIREZ and JOSE ESPINOSA, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any

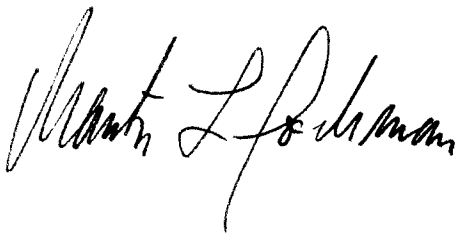
manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.

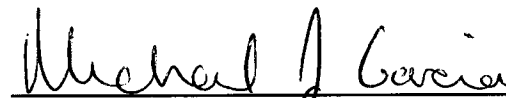
Substitute Asset Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.
(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)




MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JORGE RAMIREZ, and
JOSE ESPINOSA,

Defendants.

INDICTMENT

07 Cr.

(21 U.S.C. § 846.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Michael J. Garcia Oct. 19, -07
Foreperson.

*Indictment filed, Judge Pauley
assigned.*

7 Maas, USMT

*RC
10/19/07*